

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff.

JPMORGAN CHASE BANK, N.A.

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

Case Number: 1:22-cv-10904-JSR

**DECLARATION OF DAVID I. ACKERMAN IN SUPPORT OF
GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS'
MEMORANDUM OF LAW IN OPPOSITION TO JPMORGAN CHASE BANK N.A.'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, David I. Ackerman, declare under penalty of perjury as follows:

1. I am a member in good standing of the bars of the State of New York, the State of New Jersey, and the District of Columbia, and am admitted to practice before this Court. I am one of the attorneys representing the Government of the United States Virgin Islands in the above-captioned action. I am a Member of the law firm of Motley Rice LLC, and my office is located at 401 9th Street NW, Suite 630, Washington, DC 20004. I am familiar with the facts set forth herein and if called as a witness, I could and would competently testify thereto. I submit this Declaration

and the attached Exhibits in support of the United States Virgin Islands' Memorandum of Law in Opposition to JPMorgan Chase Bank, N.A.'s Motion for Partial Summary Judgment.

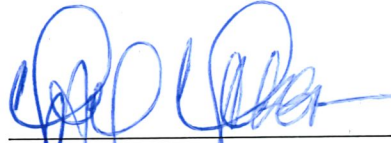
2. Attached hereto are true and correct copies of the following:

Exhibit Number	Description
Exhibit 1	Transcript excerpts of the Deposition of Assistant Attorney General Chris Timmons (as 30(b)(6) designee) , taken on July 14, 2023, in this Action.
Exhibit 2	Transcript excerpts of the Deposition of Commissioner, Department of Planning and Natural Resources Jean-Pierre Oriol (as 30(b)(6) designee) , taken on July 7, 2023, in this Action.
Exhibit 3	Document, "Bank Secrecy Act / Anti-Money Laundering Examination Manual," 2006, and previously marked as Langford Exhibit 8 (excerpt).
Exhibit 4	Expert Report of Jonathan J. Rusch, June 16, 2023 (excerpts).
Exhibit 5	Document at Bates JPM-SDNYLIT-00128583-00128713, JPM-SDNYLIT-00128583, 00128612-00128613 (excerpts) produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 6	Document at Bates JPM-SDNYLIT-00128084-00128099 produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 7	Transcript excerpts of the Deposition of Shani A. Pinney (as 30(b)(6) designee) , taken on July 18, 2023, in this Action.
Exhibit 8	Transcript excerpts of the Deposition of former Acting Attorney General Carol Thomas-Jacobs , taken on July 13, 2023, in this Action.
Exhibit 9	Transcript excerpts of the Deposition of former Attorney General Denise George , taken on July 17, 2023, in this Action.
Exhibit 10	Transcript excerpts of the Deposition of former Governor of the U.S. Virgin Islands John de Jongh, Jr. , taken on May 30, 2023, in this Action.
Exhibit 11	Transcript excerpts of the Deposition of former Governor of the U.S. Virgin Islands Kenneth E. Mapp , taken on May 24, 2023, in this Action.

Exhibit 12	Transcript excerpts of the Deposition of Governor of the U.S. Virgin Islands Albert Bryan, Jr. , taken on June 6, 2023, in this Action.
Exhibit 13	January 20, 2011, email Bates JPM-SDNYLIT-00152833 and previously marked as Langford Exhibit 40.
Exhibit 14	Transcript excerpts of the Deposition of former head of Compliance at JPMorgan, William Langford , taken on May 3, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts.
Exhibit 15	Transcript excerpts of the Deposition of former JPMorgan General Counsel Stephen Cutler , taken May 24, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts.
Exhibit 16	Transcript excerpts of the Deposition of former General Counsel of JPMorgan's Investment Bank, Jonathan Schwartz , taken July 14, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts.
Exhibit 17	The U.S. Department of Justice "Confidentiality and Media Contacts Policy," available: https://www.justice.gov/jm/jm-1-7000-media-relations#1-7.400 , last accessed August 4, 2023.
Exhibit 18	Transcript excerpts of the JPMorgan 30(b)(6) Deposition of Senior Advisor, Risk and Compliance, Francis Pearn , taken on March 29, 2023, in this Action. JPMorgan has withdrawn its initial designation of Confidential for the testimony contained in these excerpts.
Exhibit 19	Excel document at Bates JPM-SDNYLIT-W-00026257 (excerpts) produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 20	Financial Crimes Enforcement Network, Section 314(b), available: https://www.fincen.gov/section-314b , last accessed August 4, 2023.
Exhibit 21	Article by Joel Christie, et al., <i>The busy life of Jeffrey Epstein: Group of gorgeous Manhattan 'it' girls in and out of the billionaire sex offender's mansion before Clinton pal flies off in private jet with comely brunette</i> , available: https://www.dailymail.co.uk/news/article-3405407/The-busy-life-Jeffrey-Epstein-Group-gorgeous-Manhattan-girls-billionaire-pedophile-s-mansion-flies-private-jet-attractive-brunette.html , last accessed August 4, 2023.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 7, 2023



David I. Ackerman